

**FULTON BANK**  
CAPITAL DIVISION - LANCASTER/CHESTER DIVISION  
DROVERS BANK DIVISION - GREAT VALLEY DIVISION

January 28, 2004

Submitted via email to: [regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov)

Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street and Constitution Avenue, NW  
Washington, DC 20551

RE: Docket Nos. R-1167, 68, 69, 70, 71

Dear Ms. Johnson:

This letter is in response to your request for comments to proposed changes to Regulations B, E, M, Z, and DD. The pace of regulatory change being what it has been, bank officers like myself are so busy trying to figure out how to comply with new regulations that we seldom have time to digest the probable impact of, or comment on, proposed regulations. But I will try to do so in this letter.

While, to the Board, the goal of consistency of language may be important, to consumers it is almost irrelevant. If they actually use all the products, seldom do they initiate them all at the same time in their banking life. I might also add it is unusual to find a customer who cares to read all the required disclosures.

The price of consistency will be high for an already dreadfully over-regulated industry and the cost cannot be passed on to the consumer, but will be borne by the shareholder or minimally and indirectly by consumers in higher fees. Legal work, training cost, website revisions, printing, mailing and answering customer questions about new disclosures all are expensive and in my judgment unnecessary. These disclosures are already being made as required by these regulations. Who or what study demonstrates the need for a major change such as that which is proposed here?

The use of vague terminology in the proposals will undoubtedly invite lawsuits. Standards such as “reasonably understandable,” “whenever possible” and “everyday words” lack the precision necessary to adequately guide banks in complying with those standards. At the same time, the new standards will undermine whatever legal precedent may exist under current rules, and legal uncertainty will prevail.

For these and other reasons, I urge you strongly not to adopt the proposed regulations.

Very truly yours,

Richard J. Ashby, Jr.  
Chairman and Chief Executive Officer  
Fulton Bank

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